

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT

I. HEADING

Date: July 10, 1998

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Subject: Pyridium Mercury Disposal Site No. 1 (Pyridium 1)
Village of Harriman, Orange County, New York

POLREP NO. Nine (9)

II. BACKGROUND

Site No.: EV
Response Authority: CERCLA
NPL Status: Non-NPL
State Notification: NYSDOH notified
Action Memo Status: Signed 09/29/95, 9/25/97 and 3/6/98
Start Date: 1/9/95, 9/30/97, and 3/18/98
Demobilization Date: 4/5/95, on-going
Completion Date: 4/7/95, on-going

III. SITE INFORMATION

A. Incident Category: Illegal dump

B. Site Description

1. Site location

The Pyridium Mercury Disposal Site No. 1 (Pyridium 1) was a trailer park located at the intersection of State Route 17M and Harriman Heights Road in the Village of Harriman, Orange County, New York. Five mobile home trailers were located at the trailer park. All the trailers were occupied as residential dwellings.

A white clay-like material discovered at the trailer park, was used to fill low-lying areas of a wetland. This material was reportedly a waste product from the production of niacinamide by the Pyridium Corporation during the 1940's and 1950's. Nepera Inc. of Harriman, New York, currently occupies and operates the facility previously operated by the Pyridium Corporation.

B. Preliminary Assessment/Site Inspection Results

On October 20, 1994, the United States Environmental Protection Agency (EPA) collected a composite waste sample for waste characterization and mercury speciation. The sample was analyzed for Target Compound List (TCL) parameters, Target Analyte List (TAL) parameters and toxicity by the Toxicity Characteristic Leachate Procedure (TCLP).

Although the TCLP results are below regulatory limits, the TAL analytical results indicate the presence of mercury at an estimated concentration of 130 milligrams per kilogram (mg/kg). All the other compounds detected were below the New York State Department of Environmental Conservation (NYSDEC) recommended soil cleanup objectives.

Mercury speciation analytical results indicated that the sample contained no significant quantities of elemental mercury, mono-methyl mercury, or dimethyl mercury. When the sample was dissolved in an acid leach test, the mercury +2 ion leachate concentration was essentially the same as the total mercury concentration. Based on these results, the laboratory concluded that the sample was a chemical substrate contaminated with a mercuric or mercurous salt.

On November 17, 1994, the EPA Environmental Response Team (ERT) and the Response Engineering and Analytical Contractor (REAC) collected dust samples in each of the mobile homes at

the trailer park. The analytical results of the dust sampling indicated mercury concentrations ranging from 0.84 mg/kg to 26.8 mg/kg.

On November 28, 1994, Nepera, Inc. of Harriman, New York signed an Administrative Order on Consent (AOC) with EPA agreeing to fund relocation of the residents of the trailer park. Nepera has distributed relocation settlements to eligible residents. The amount of the settlement was based on federal relocation guidelines.

On January 9, 1995, verbal authorization was given by the EPA Director of the Emergency and Remedial Response Division to decontaminate, remove and dispose of the mobile homes, storage sheds and decks from the trailer park; disconnect water, sewer and electric utilities; remove heating oil and propane storage tanks; and fence the property and post warning signs. An Action Memorandum confirming verbal authorization was approved on February 27, 1996. For specific details refer to Polreps 1-3.

IV. RESPONSE INFORMATION

A. Situation

1. Current situation

ERRS continues excavating, stockpiling and load out operations of mercury contaminated soils.

2. Removal actions to date

On June 29, fifteen tanker trucks of water were transported to Cycle Chem/Clean Venture located in Camden, NJ and Clean Harbors of CT located in Bristol, CT for off-site treatment and disposal. Post excavation samples were collected (after the water was pumped out and visual waste was removed) to verify that the EPA established clean-up goal was achieved. Once samples were collected, the area was backfilled to minimize pooled water in the excavations. ERRS continued to excavate in the south area of the site. A sewer line was damaged during the excavation. After temporarily patching the sewer line, the excavator would not start.

On Tuesday, June 30, the excavator was jump started and ERRS resumed excavation and load out of the waste. ERRS permanently repaired the sewer line with Orange County Sewer District oversight.

Analytical results of a sample collected by the culvert box showed the mercury concentration exceeded the clean up level. Additional samples were collected at depth in 1' increments until the mercury concentration was below the clean up level. Contaminated soil will be excavated to that depth in the culvert box area.

On Tuesday, June 30, ERRS brought out a Response Manager to overlap and replace the regular Response Manager during his vacation next week. On July 1, the excavator was repaired, two additional water tankers transported water to Clean Venture in Camden, NJ for off-site treatment and disposal, and the site was secured for the holiday weekend. The site was demobilized on July 1. Security was on site over the extended weekend during EPA off-site hours.

During the week of July 6, 1998, ERRS remobilized to the site to continue excavating, stockpiling and load out operations.

On July 9 and 10, three and two tanker trucks transported water from the site for off-site treatment and disposal at Clean Venture in Camden, NJ.

As of Friday, July 10, a total of 5,942.94 tons of mercury contaminated soils were loaded for off-site disposal at the G.R.O.W.S. landfill in Morrisville, Pennsylvania. Also as of July 10, 178,444 gallons of surface, perched and rain waters were pumped and loaded for off-site treatment and disposal at Clean Venture and Clean Harbors of Connecticut located in Camden, NJ and Bristol, CT, respectively. Approximately 5,545 tons of backfill material have been delivered to the Site to backfill the excavated cavities.

3. Enforcement

The Office of Regional Council is reviewing available site documentation to identify PRPs and will evaluate the viability of legal claims stated by Nepera.

B. Next Steps

- A. Excavation and transportation and disposal of contaminated soil will continue.
- B. Dewatering the excavation.
- C. Collection of post excavation samples.

C. Key Issues

Since the beginning of the project, the T&D subcontractor has not provided the number of trucks we requested to transport and dispose of contaminated soil from the site. Numerous calls were made to the company, but it was only twice that we received the 15 trucks we continuously requested. This issue continues to be a problem.

V. COST INFORMATION

The following are estimated costs for the removal action as of July 10, 1998:

	PROJECT CEILING	PREVIOUS COSTS	COSTS TO DATE	FUNDS REMAINING
ERRS (ERCS) Costs	\$1,028,400	\$102,000	\$586,400	\$340,000
START (TAT) Costs	\$ 81,400	\$ 19,700	\$ 17,500	\$ 44,200
Contingency	\$ 209,500			\$209,500
EPA Cost	\$ 107,000	\$ 24,200	\$ 41,900	\$ 40,900
TOTAL PROJECT CEILING	\$1,426,300	\$145,900	\$645,800	\$634,600

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure, which the EPA may include in any claims for cost recovery.

VI. DISPOSITION OF WASTE

Waste stream	Medium	Quantity	Containment-Migration Control	Treatment	Disposal
Non-hazardous soil, wood, PPE and debris	solid	5,943 tons	dump trailers/triaxle dump trucks	landfill	G.R.O.W.S. Landfill, Morrisville, PA
Non-hazardous, non-DOT water contaminated with mercury	water	147,714 gallons	tanker truck	waste water treatment	Cycle Chem/Clean Venture Inc. Camden, NJ
Non-hazardous, non-DOT water contaminated with mercury	water	41,730 gallons	tanker truck	waste water treatment	Clean Harbors of Connecticut, Bristol, CT